

IN THE UNITED STATES DISTRICT COURT FOR  
THE MIDDLE DISTRICT OF ALABAMA

RECEIVED

Richard Wayne Wright, Sr. # 187140  
 Full name and prison number  
 of plaintiff(s)

v.

Selvester Nettles, et.al.

See attach pages For  
additional defendants

Name of person(s) who violated  
 your constitutional rights.  
 (List the names of all the  
 persons.)

2005 MAY 11 A 10:41

DEBRA P. HACKETT, CLK  
U.S. DISTRICT COURT  
MIDDLE DISTRICT ALACIVIL ACTION NO.  
(To be supplied by Clerk of  
U.S. District Court)

2:05CV 439-A

## I. PREVIOUS LAWSUITS

A. Have you begun other lawsuits in state or federal court dealing with the same or similar facts involved in this action? YES  NO

B. Have you begun other lawsuits in state or federal court relating to your imprisonment? YES  NO

C. If your answer to A or B is yes, describe each lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same outline.)

## 1. Parties to this previous lawsuit:

Plaintiff(s) Richard Wayne Wright, Sr.Defendant(s) Selvester Nettles, et.al

2. Court (if federal court, name the district; if state court, name the county) United States district

Court March 3, 2005 they receive law suit on  
March 7, 2005

3. Docket number N.A.

4. Name of judge to whom case was assigned I have not receive any response From district Court

5. Disposition (for example: Was the case dismissed? Was it appealed? Is it still pending?) Pending (I assume)

6. Approximate date of filing lawsuit March 3, 2005

7. Approximate date of disposition N.A.

II. PLACE OF PRESENT CONFINEMENT Ventress Correctional Facility, P.O. Box 767, Clayton, Ala. 36016  
 PLACE OF INSTITUTION WHERE INCIDENT OCCURRED Ventress, Bullock, Draper and Kilby Correctional Facility

III. NAME AND ADDRESS OF INDIVIDUAL(S) YOU ALLEGE VIOLATED YOUR CONSTITUTIONAL RIGHTS.

## NAME

## ADDRESS

1. Selvester Nettles, et.al. Bullock Correctional Facility, P.O. Box 5107, UNION Springs, Ala.
2. 36089. (See additional pages
3. For additional defendants with addresses).
4.
5.
6.

IV. THE DATE UPON WHICH SAID VIOLATION OCCURRED First began on or about June 2001 and has been on going occurrences.

V. STATE BRIEFLY THE GROUNDS ON WHICH YOU BASE YOUR ALLEGATION THAT YOUR CONSTITUTIONAL RIGHTS ARE BEING VIOLATED:

GROUND ONE: Cruel and Unusual punishment, equal protection violation and due process violation.

STATE BRIEFLY THE FACTS WHICH SUPPORT THIS GROUND. (State as best you can the time, place and manner and person involved.)

See attach Brief (Issue I)

and attach motions

GROUND TWO: Conspiracy to deprive plaintiff of Civil rights and insufficient Medical care

SUPPORTING FACTS: See attach brief (Issue II) and attach Motions

GROUND THREE: Conspiracy to deprive plaintiff of life, liberty and property, equal protection violations based on race.

SUPPORTING FACTS:

See attach brief ( Issue III )

and attach motions

VI. STATE BRIEFLY EXACTLY WHAT YOU WANT THE COURT TO DO FOR YOU.  
MAKE NO LEGAL ARGUMENT. CITE NO CASES OR STATUTES.

Appoint plaintiff an attorney, send plaintiff a transferal  
of records Form to get the exhibits (he) sent to the United States  
district Court, if this is not the proper Form Construe it into the  
proper Form, pro se litigant and grant any and all relief Plaintiff  
shows himself intitled to as indicated in his brief.

Richard W. Wright, Jr.

Signature of plaintiff(s)

Richard Wayne Wright, Sr. #187140

I declare under penalty of perjury that the foregoing is true  
and correct.

EXECUTED on 29 April 2005.  
(Date)

Richard W. Wright, Jr.

Signature of plaintiff(s)

Richard Wayne Wright, Sr. #187140

Pro - se litigant

Richard Wayne Wright, Sr.  
Plaintiff,

- VS -

Defendants

Captain Selvester Nettles

Dr. Hammer

Mr. Steve Z (Dr. Hammer asst.)

Dr. William Sanders

Dr. Smith

Mrs. Gorman

Mrs. Biven-tutt

Sgt. Alberta Williams

Sgt. Micheal Strickland

Sgt. Smith

Sgt. Davis

Sgt. Jackson

Sgt. Ligon

ofc. Scott

ofc. Bland

ofc. M. Austin

\*

\*

\* Case No \_\_\_\_\_

\*

| ofc. Brenda Austin

| ofc. Robert Washington

| ofc. Timothy Holmes

| ofc. Brian Hampton

| ofc. Z Ellis

| ofc. Foster

| ofc. Harvey Ruffin

| ofc. A. Rudolph

| ofc. Johnny Bailey

| John Doe I

| John Doe II

| John Doe III

| Gwendolyn Babers

| John Doe IV

| Inmate Walton Solomon

| A.I.S.# 217565

The Above Defendants Address as Follow:

Bullock Correctional Facility

P. O. Box 5107

Union Springs, Ala. 36089

Captain Tony Patterson

Sgt. Highthorn

Page A.

Mrs. Johnetta Johnson | ofc. Gordon  
Mrs. L. W. Robbins |

The above defendants address as follow:

Draper Correctional Facility

Highway 143  
P. O. Box 1107  
Elmore, Ala 36025

Dr. Bell | John Doe II

Ms. Crenshaw | MS. John Doe VI

The above defendants address as Follow:

Kilby Correctional Facility

P. O. Box 150

MT. Meigs, Ala. 36057

Lt. Janet Hicks

The Above Defendants Address as follow:

Frank Lee Youth Center

P. O. Box 208

Deatsville, Ala. 36022

Lt. Hollie | ofc. Veronica Stringer

Lt. Dowling | Nurse Hunter

Sgt. Cargill | Mr. Bruton

ofc. Pullum | Cpt. Monk

The above defendants address as Follow:

Page B

Ventress Correctional Facility  
P.O. Box 767  
Clayton, Ala. 36016

Page C

Richard Wayne Wright, Sr.  
Plaintiff,

-VS-

Selvester Nettles, et. al,  
Defendants.

## ISSUE I

The Following individuals defendants has shown cruel and unusual punishment, Breach of oath, Breach of the Constitution, Cause me personal injuries, psychological injuries, deprivation of Civil rights, breach of department of Correction policies, equal protection violation and deliberate indifference.

### I.

ON November 3, 2004 Plaintiff was assaulted by inmate Walton Solomon (W/M A.I.S # 217565). I was arguing with inmate Robert ? before inmate Solomon got involve (see exhibits (20)). The officers on duties in the Segregation Unit as well as the officers

in the Shift office (after I was assualted by inmate Solomon). They did not give me the chance to explain the incident while in the shift office. Due to baisiness demonstrated by officer Holmes and Lt. Babers while in the presents of Sergeant Davis and Sergeant Jackson and another officer (John Doe I) (that broke up the Fight me and Walton had). Once I arrived at the shift office I was made to stay outside the office for about (15) to (20) minutes while inmate Walton talk to them in the shift office. Once I was called into the office Lt. Babers stated, So you like to fight don't you. I told Lt. Babers I have not been fighting in a long time since I was at Kilby prison. Me and him had several problems in the past, it was wayed over due from me and him not getting into it before now. Before I could go on any futher Lt. Babers stated again, So you like to fight don't you! I told Lt. Babers

You can say that, you would say that wouldn't you! She said "no, that's what you're saying. I said, "no, that what you said, at this point Sergeant Jackson escorted me to the infirmary.

ON December 1, 2004 Plaintiff was Found guilty of Rule Violation #31 assualt on another inmate. (See exhibit ten (10) two Sided Form. Plaintiff due process rights were violated according to the A.R. #(403) of the Alabama Department of Correction (A.D.O.C.). Me and Walton had two arguments prior<sup>R.W.W.</sup> to this about the racial statements he made about a black woman. On November 3, 2004, Lt. Baber was the Correctional official which design the Violation against plaintiff as described. Officer M. Austin did not write my witnesses names down on the disciplinary Form which were his Supervisor Lt. Babers and Co-Worker officer Holmes. (See exhibit (10) line(8)).

None of the defendants directly

Knowledgeable about the incident between Plaintiff and inmate Walton was present at the disciplinary hearing - Officer R. Washington (hearing officer) Officer P. Philips and Sergeant Ligon (plaintiff escort) was at the disciplinary hearing. Officer Washington along with Sergeant Ligon made phone calls in my presents until they got some one on the phone which stated he was officer Holmes. After asking where were the witnesses I ask for and/or the person I am being accused of assaulting. Officer Washington stated, I did not have a witness neither was it necessary that inmate Walton be there. Since officer Austin did not record my requested witnesses, my questions for Lt. Babers ~~that~~<sup>R.W.W.</sup> were disregarded and I had to make it my written statement in order to have it add to the record. (See exhibit (13)). Officer Washington only ask the man on the phone (allegedly officer Holmes) three of plaintiff question at the hearing. (See exhibit (14)) (two sided form).

Officer Hampton served plaintiff a notice of rescheduling of the disciplinary hearing. (See exhibit (12)). The defendants fail to comply with the rescheduling date November 23, 2004 and /or the due process procedure afforded to plaintiff according to the A.R. # (403), Section III. Procedure before hearing, (C)(F). Due to plaintiff being indigent and having no access to a copy machine plaintiff ask that this Court order defendants to produce a full and complete copy of the A.R. # (403) described to this Court and send plaintiff a copy of this Complaint after it has been clock stamp with plaintiff exhibit (1) thru (26).

A ~~complaint~~ <sup>R.W.W.</sup> similar complaint was sent to the United States district Court on March 3, 2005. Plaintiff sent all exhibits (1) thru (26) to the United States district court. Plaintiff has not been able to get a response from the United states district court and for such reasons plaintiff is not able to send all exhibits listed in this Complaint until he retains them from the

district Court or Copies From plaintiff prison file.

## Issue II.

The Following individuals defendants took part and /or are a part of shown, Cruel and Unusual punishment, Breach of Oath, psychological injuries upon plaintiff, deprivation of plaintiff Civil rights, In-Sufficient medical Care / treatment and preventing plaintiff access to Court.

## II.

IN November 2004, officer A. Rudolph cut plaintiff water off in Segregation cell eight (8) after calling the (seg.) Cubical officer misleading him/her stating he was cutting the water off in the cell I was housed in because I was flooding the cell. Plaintiff was cleaning the floor in (8) cell. I ask officer A. Rudolph why was he going to turn the water off in the cell, no water was going under neath the door. He only laugh

at me stating to the other officer, "he must think he can walk on water (it was as a joke to them). Due to plaintiff being subjected to this type of treatment I put the dung from my body into the sink to keep from having to smell dodo and pist all day long. Officer Parham came to the (seq.) Unit one (1) or two (2) days later and cut the water back on for plaintiff after he would not take part with his co-workers actions (in the psycho-logical torture) administered by defendant A. Rudolph upon plaintiff.

Plaintiff is having trouble distinguishing exactly which defendants order plaintiff food to be reduced to two (2) meals daily, mattress taken from 7 A.M. until 4:30 p.m. and privilege taken twice for a disciplinary infraction placed upon plaintiff in September 2003 which plaintiff challenge because it effected his liberty interest. (Civil Action No.

2:04 - CV - 675 - F).

Defendants and defendant's Co-Workers directly and indirectly, intentionally and willingly, disregarded plaintiff due process rights as prescribed in the A.R. # (403). This use of power and Force has gone beyond the prison officials scope of duty. I sent request slips, gave up meals for about Fourteen(14) days in order to talk with one of the Wardens higher than Captain Nettles, but all such requests were being intercepted and / or intentionally being given to defendant Captain Nettles. I thought when he was out for approximately two (2) or three (3) weeks things would have gotten better concerning plaintiff being permitted to receive a visit from his Family, and plaintiff requested to be placed in protective custody along with his phone privileges restored. For no determinable reasons outside retaliatory motives plaintiff has suffered physical and psychological pains and remain subjected to defendant's

harsh treatment.

Plaintiff has sent several sick call slips by officer Ruffin and office Foster to the infirmary (which has went unanswered for weeks). Due to officer Ruffin and officer Foster involvement Plaintiff were told by the nurses (during medication delivery) they did not get my sick call slips. After Plaintiff saw the substituting doctor (in December) the medication for head aches which were prescribe by him (had a different effect upon plaintiff) than the medication Dr. Siddig pre-scribe prior to this doctor visit. Due to the nurses [which were escorted by officer Bailey and officer Ruffin] (having no identification tags) and unwilling to give their names Plaintiff ask that these defendants be noted as Ms. Jane Doe II and Ms. John Doe III. Officer Bailey and officer Ruffin has on many occasion intervene into Plaintiff conversation with the nurses and closed the tray door which Plaintiff

receives the medication Stating I refuse medication.

The Nurse on 3<sup>rd</sup> Shift (Ms. John Doe IV) escorted by officer Hampton on <sup>R.W.W.</sup> February 11, 2005 Ver- bally stated that I would get my prescribe medicine if she could bring it back, (which she never did). Ms. John Doe IV claim I have to tell the officers, before she comes if I want my medication. This puts me at a disadvantage and at the mercy of the on duty officer(s) (Which are Officers M. Austin, officer Hampton, officer Bailey, officer Foster, and officer Ruffin Concerning my health and present suffering. Plaintiff is Constantly, being placed under a great amount of stress and seek help From the Court to relieve plaintiff From Such Stress placed upon plain- tiff by defendant(s).

Plaintiff has been purposely Separated From his legal work For- bidden on many occation access to

to law books and helpful litigation Material (while restrain in the Segregation Unit). Officer Ruffin and officer Foster are directly involved in this intervention under the direct Supervision of Captain Nettles. I have question officer Ruffin action Several times Concerning things am intitled to where in his Responses was he don't make the rules he just Follow them.

ON February 11, 2005 officer McCall brought plaintiff the store Slip Plaintiff Sent Captain Nettles. This was a request to receive Stamps, lotion, and three (3) Food items, From the Canteen Clerk in which Captain Nettles rejected. These action are administered in a Malicious and Capricious manner. Plaintiff brings these Complaints unto this Court to curb defendant Nettles action in preventing plaintiff From contact with the Courts and his Family with Wrongful intention of harming Plaintiff.

tiff pyscologically and physically, Continually.

IN Conclusion plaintiff needs the assistance of an attorney and/or law student to help him file the needed Motion to obtain Copies of plaintiff Medical Files, Rules and Regulation governing these prison officials, discovering names of unknown defendants, filing the proper motion to keep plaintiff safe from any further harm from defendants, obtaining affidavits from witnesses, receiving documents (mental health files, medical records, incident reports, etc.) in which defendant(s) refuse to allow plaintiff because he is incarcerated. And to file the necessary injunction / restraining orders on defendants for plaintiff plea for his life. To have other doctors to examine plaintiff to access plaintiff damages and determine the cause of plaintiff illnesses.

### III.ISSUE

The Following individuals defendants has shown cruel and unusual punishment. Involuntary Force medication 8-20-02; 8-21-02, plaintiff suffers psychological injuries, Breach of Department of Corrections polices, Plaintiff suffers personal injuries, excessive Force and assault on plaintiff. No justification of Mental health status, excessive and inappropriate use of psychotropic medication administered into plaintiff body. Psychotropic Medication prescribed For disciplinary purposes, § 5.35 medical code. Deprivation of the U.S. Constitution (14) amendment afforded unto plaintiff.

### III.

ON August ? 2001, I was sent to Bullock Correctional Facility (here after (B.C.F.)) From Kilby Correctional Facility (here after (K.C.F.)) as a result of excessive and inappropriate use of psychotropic Medication which was administered into my body. By defendants. Dr. Bell, Ms. Crenshaw, Captain (John Doe II) Nurses (Ms. John Doe III) and Certain correctional officers

(which names are not known which were present) directly or indirectly under the orders of the above listed individuals / defendants. These course of actions was initiated at Draper Correctional Facility (here after (D.C.F)). By defendants Captain Patterson, Officer Gordon, Sergeant Highthorn, Warden Cummings , Ms. Robbin and Ms. Johnson . Once Plaintiff arrived at (B.C.F) Ms. Gorman under the supervision of Dr. Smith and Dr. Sanders Continued to placed demands upon plaintiff involuntary administered psychotropic medication against Plaintiff will. (See exhibit (I)). Plaintiff requested (after this hearing recommending force medication [psychotropic] into plaintiff body with milicious intent), to receive the involuntary medication review committee's written decision , this request was denied by officer Ruffin, Ms. Gorman , and Dr. Smith . (see exhibit (I)).. You have the following rights . I was told before permitted a visit with my family (on two (2) separate occasion) by Ms. Gorman and

Dr. Smith if I Fail to Comply with their recommendation Concerning psychotropic medication I would be placed in a lock up cell (quiet room) or strip Cell or the Segregation Unit at (B.C.F) as I was placed in one (I) at (K.C.F) -- (P-I) Unit.

ON October 3, 2001 I was sent back to (K.C.F) From (B.C.F) under the influence of involuntary administered psychotropic Medication, For an evidentiary hearing against Several Alabama Department of Correction (A.D.O.C.) officials. Plaintiff has good reasons to believe defendant(s) directly / indirectly order and administered involuntary psychotropic drugs through doctor Food and intimidation at (K.C.F) by defendants Dr. Bell, Ms Crenshaw Captain (John Doe II) and intimidation, threats at (B.C.F.) by defendants Ms. Gorman, Dr. Smith, Dr. Sanders, Captain Nettles and officer Ruffin, all under the Supervision of Captain Nettles.

ON June 3, 2002 after plaintiff was arguing with another inmate in

(19) dorm. Sergeant Strickland told me I would be placed in segregation for a few hours but he did not put inmate Gallaway in segregation for investigation only me. This was done because they wanted to place me in mental health status with recommendation to force medication (mind altering drugs). Officer Scott (arresting officer) indicated no physical contact was made. Sergeant Strickland disregarded Plaintiff safety and re-arranged the purpose for me going to segregation (see exhibit (4)). It is clear in plaintiff mind now defendant(s) motives are intended to injure plaintiff directly or indirectly any way possible. Plaintiff never signed a living agreement with inmate Gallaway, due to Sergeant Strickland malicious motives. Sergeant Perry (the bed / work roster placement personnel) after release from mental health dorm plaintiff were assigned (in the bunk) over

inmate Gallaway under the supervision of Captain Nettles. This incident / information was forwarded to Keith Armagost plaintiff (Classification Specialist) and Charles Blackledge (Classification specialist Supervisor) as a result of defendant(s) Sergeant Strickland malicious behavior and Captain Nettles approve of such action Plaintiff institutional progress and eligibility to go to a lesser restricted Camp was hindered. See exhibits (23) and (24). Time after time by the Mental health staff / Member(s) team recommendation were made for plaintiff to be release from any and all Mental health holds, but defendants Mr. Armagost, Ms. Seals, Captain Nettles, and Mr. Blackledge created other holds / restraints to hinder plaintiff liberty interest and subject plaintiff to physical and psychological pains and injuries.

ON August 15, 2002 Sergeant Strickland assualted plaintiff in the

infirmary lobby because plaintiff refused to report for recommended psychotropic / mind altering drugs. I inform officer White (Mental health dorm assignment) this day August 15, 2002. I did not need to go to the infirmary for a psychotropic shots as requested because I sign several refusal forms in rejecting mind altering drugs. Officer White left and return shortly after stating his supervisor (Sergeant Strickland) instructed him to send me to the infirmary immediately. Upon my arrival at the entrance door of the infirmary Sergeant Strickland (while holding a clip board with the recommended shot list) used derogatory language because he emphasized my unwillingness to report the first time officer White came to me. After I attempted to explained the refusal forms I sign repeatedly in the past to take psychotropic medication (shots or pills) I did not need Sergeant Strickland refuse to stop.

Using derogatory language mixed with orders for me to shut my fucking mouth and listen to what the fuck he had to say. I commence to explain the reason for my delay after entering the infirmary lobby. I ask him how could I explain if I have to shut my fucking mouth. He told me to go stand on the wall and shut my fucking mouth. Once I stood on the wall Sergeant Strickland came within three feet of me while pointing his finger at me and order me to come to him in a harsh manner. Once I got within arms length of him he drop the clip board and papers and grab my shirt trying to throw me down on the floor in which I was able to prevent him from doing. He then release my shirt and commence to bend over while reaching down to pull my leg from under me. I bent over his back in order to try and break my fall before the back of my head hit the floor. Moments later I felt ~~from~~ R.W.W.

tremendous pain in my left leg while he stood over me standing on my knee. As I attempted to get up while turning side ways to relieve the pain in my left leg he slam my head into the floor and told me not to move. Officer James open the door of the infirmary at which time Sergeant strickland order for me to turn over, While you're on my leg. After he got off my leg Sergeant strickland put the cuff's on me and took me into the infirmary to receive a body chart.

Captain Nettles allowed Sergeant Strickland to conduct his own investigation. (See Exhibit (2)). Which plaintiff never was afforded a chance to see Captain Nettles or one of the Wardens (Holt or Boyd). After wards Lt. Miller did an extension for pending investigation. (See exhibit (3)). Plaintiff never understood why Captain Nettles place a Mental health label upon plaintiff at that time and why Sergeant strickland was not discipline for the assualt on

Plaintiff. Captain Nettles had Officer Ruffin to harass me then because I refuse to sign the notice of involuntary Medication hearing. (See exhibit (I)).

Plaintiff has been forbidden to transfer to any other prison since defendant Captain Nettles and/or [agents] officer Ruffin, Sergeant Strickland, Charles Blackledge, Keith Armagost, and Sherry Seals until they could create the right situation to apply their False label again (Mental Health) upon Plaintiff. Plaintiff now understand better (why) the defendant(s) has Conspired together to inflict torture upon plaintiff and subject plaintiff into physical and ~~psycho~~<sup>R.W.W.</sup> psychological injuries. Plaintiff is being held at this institution (B.C.F.) purposely until the New Mental Health Facility is complete and the defendants and/or agents are able to put plaintiff out there and induce him with psychotropic drugs.

Plaintiff has met the criteria for a lesser restricted camp but ~~Point~~<sup>R.W.W.</sup> Whaley has used defendant Sherry Seals and her supervisor Charles Blackledge to frighten Plaintiff by threatening to send me to a level II to subject me to inmates which are ~~over~~<sup>R.W.W.</sup> easily influence or persuade to take Plaintiff life because of the hopelessness of their situation. There is no where in the policy which govern these prison officials where in defendant Mrs. Seals should have threaten Plaintiff with such classification which was arbitrary or capricious or that is constituted a clear abuse of discretion. (See Exhibit (6)(7) and (8)).

Defendant Mrs. Seals has repeatedly placed a hold upon Plaintiff from being transferred to another institution. Plaintiff went to the mental health counselor Ms. Biven-tutt and ask her to inform Mrs. Seals Plaintiff is not in a mental health

status (which she did). Due to Plaintiff present state of being (separated from his law material and needed) plaintiff is unable to send these documents at such time. Plaintiff ask that this court make note that plaintiff will send these documents as soon as he can get out of the defendants harsh treatment and receive his legal material which defendant Captain Nettles purposely separated from him. Plaintiff did not realize when defendant Armagost placed those label upon him this was the reason plaintiff would not be able to leave this institution. (see exhibits (23), (24), and (25)). Defendant Mrs Seals has decided to join these individuals and conspire with defendants Captain Nettles, Mr. Blackledge, Mr. Whaley and defendant Nettles agents,-- officer Foster and officer Ruffin. Mr. Whaley has maximized plaintiff's custody outside the scope of the classification manual for which I am being bared from level III's, II's and

I's and or lateral transfer institutions, nor a honor Camp / Work release and label plaintiff as a dangerous violent predatory which has cause his Opportunities / eligibility For parole denied. ( See exhibits (25)). The Defendant Segerest and/or parole board members has not indicated in writing to plaintiff why they denied plaintiff eligibility For Parole . Now all these labels placed upon plaintiff is thought to be the Cause For which plaintiff is being Forbidden to <sup>R.W.I.W</sup> grant parole . These defendants ~~intend~~ indeed has created this liberty interest and interrupted his Chances For parole .

Defendant Captain Nettles has ordered defendants officer B.Austin , officer/ Sergeant Smith, Sergeant Lieutenant Hicks to accuse and Find plaintiff guilty For a rule violation # (38) in September 2003 plaintiff was presently addressing defendants Malicious act in Court (Bullock Circuit Court CVV- 14- 12.60, CR-03-0931). Defendant

Captain Nettles has allowed his agents officer B. Austin, officer / Sergeant Smith and Sergeant / Lieutenant Hicks to construct a disciplinary and violated plaintiff due process rights. Ignored plaintiff witness statement to keep plaintiff from leaving this institution. Plaintiff can not at this time send the Courts these exhibits due to the exhibits were sent to the United States district Court and Plaintiff only obtain one copy of certain document he sent to them. Plaintiff sent the Court a complaint but the Court stated they did not receive Plaintiff Complaint in September 2004 (see exhibits (15) and (16)). Plaintiff will send the Court what documents he posses ~~as w.w.~~<sup>s.w.w.</sup> copies of and Plaintiff is attempting to regain the exhibits he sent to the United States district Court on March 3, 2005.

Plaintiff did report to defendant Captain Nettles how defendants officer Brenda Austin, Lieutenant Janet Hicks

did Willingly and Knowingly disregard Plaintiff due process right in order to placed said disciplinary infraction in September 2004 upon Plaintiff to prevent Plaintiff from transferring, for retaliatory, ill and malicious intentions. Alter Plaintiff paper work in order to continue this said disciplinary infraction process. Plaintiff made these defendants action known to defendant Captain Nettles but he took no concern to such notice. (See exhibit (17) and (26)).

### Relief Sought

Plaintiff hopes he has presented the proper evidence for this Court to issue a restraining order upon defendants to preserve his life, liberty, and property as afforded by the United States Constitution Amendment Fourteenth (14). Excessive and inappropriate use of <sup>R.W.W.</sup> Psycho -

tropic drugs with intent to Con Spire to Commit Murder. Criminal Charges Violation 18 USC 242, Cruel and unusual punishment (6-11-20) (\$3,000,000). Punitive damages in the amount of (\$3,000,000). Pupensitory damages in the amount of (\$3,000,000) Monatory damages in the amount of (\$3,000,000), Personal injuries (\$3,000,000) Psychological Manages (\$3,000,000). Deliberate indifference (\$3,000,000) Injunction For denying P.C. (6-6-500) to (6-6-503). 42 USC 1985 Conspiracy. 42 USC 1997 Violation of an institutionize person. Plaintiff ask that this Court grant attach motion For appointment of Counsel and /or law student(s), Motion For a complete physical examination by health care personnel not presently paid by Alabama Department of Correction through (P.H.S.) Prison health services. Plaintiff ask that this Court Clerk send plaintiff <sup>R.W.W.</sup> a Front page, Clock stamp Copy once it is processed For Further proceeding and grant plaintiff time

to retrieve the exhibits mention  
(but not accompanied) in support of  
this Complaint From the United  
States district which I Sent them.  
Any and all other relief that  
is deemed by the Court.

Done this the 30 day of April,  
2005.

Respectfully Submitted,  
Richard W Wright, Sr.  
Richard W. Wright, Sr. #187140  
Plaintiff, pro-se.

Plaintiff Address

Richard Wayne Wright Sr, #187140  
Ventress Correctional Facility  
Dorm 9-B (Seg.)  
P.O. Box 767  
Clayton, Ala. 36016

CERTIFICATE OF SERVICE

This is to Certify that I am the  
Page 28 of 29

Petitioner in the above / attach  
encampioned Matter and I have this  
the 30 day of April, 2005, sent this  
Complaint to the clerk of this court,  
properly address and mailed by way  
of U.S. Mail with pre-paid postage.

Done this the 30 day of April,  
2005.

Respectfully Submitted  
Richard Wayne Wright, Sr.

Richard Wayne Wright, Sr. #187440  
Petitioner, Pro- se.